

**REMARKS**

The Office Action dated December 13, 2004 has been carefully considered. Claims 1-31 are pending. The above amendments and the following remarks are presented in a sincere attempt to place this Application in condition for allowance. Claims 1, 4, and 7 have been amended, and Claims 5-6, 13-28, and 30 have been cancelled in this Response. In addition, new Claim 31 has been added in this Response. Reconsideration and allowance are respectfully requested in light of the above amendments and the following remarks.

An interview was held with Examiner, Mr. Ronald W. Leja, on February 9, 2005, to discuss the rejections under 35 U.S.C. § 102(b) and the proposed amendments thereto. Applicants wish to thank the Examiner for his time and the courtesies extended.

Claims 1, 3-5, 7-10, 13-23, and 30 stand rejected under 35 U.S.C. § 102(b) in view of U.S. Patent 6,327,125 to Colclaser et al. (Colclaser). Insofar as these rejections may be applied against the amended claims, they should be deemed overcome. Claims 5, 13-23, and 30 have been cancelled in this Response. Therefore, the rejections of these claims are moot.

Claim 1 has been amended to include a distinguishing feature of the present invention. The second circuit of amended Claim 1 comprises: “a node coupled to the first circuit; and first and second diodes coupled to the node.” Furthermore, the first circuit of amended Claim 1 is “directly connected to the IO pad and the protected component.” Support for this amendment is shown in FIG. 1 of the drawings.

The Colclasser reference does not teach, suggest, or disclose these features of the present invention. Specifically, Colclaser discloses a system for decoupling a capacitive path from an I/O pad and a protected component, but Colclaser’s invention does not teach that the first circuit is

directly connected to the I/O pad and the protected component. Furthermore, Colclaser does not disclose the unique configuration of the second circuit.

In contrast with the cited reference, the configuration of the claimed invention provides many advantages. When the first circuit ceases to conduct, the I/O pad and the protected component are shielded from any capacitance due to the second circuit. The direct connection to the I/O pad and the protected component enables this feature. The configuration of the second circuit also shields the I/O pad and the protected component from variations in voltage that exceed the activation voltages of the diodes. For example, if one diode is connected to ground, then the diode creates a conducting path from ground to the I/O pad when the voltage difference between the I/O pad and ground exceeds the activation voltage of the diode. This connection to ground protects the input coupled to the I/O pad by preventing the voltage difference between ground and the I/O pad from exceeding the activation voltage of the diode. The claimed invention is clearly superior at shielding the I/O pad and the protected component, unlike the teachings of Colclaser.

In view of the foregoing, it is apparent that the cited reference does not disclose, teach, or suggest the unique combination now recited in amended Claim 1. Applicants therefore submit that amended Claim 1 is both clearly and precisely distinguishable over the cited reference in a patentable sense, and is therefore allowable. Accordingly, Applicants respectfully request that the rejection of Claim 1 under 35 U.S.C. § 102(b) in view of Colclaser be withdrawn and that amended Claim 1 be allowed.

Claims 3-4 and 7-10 depend upon and further limit amended Claim 1. Hence, for at least the aforementioned reasons, these Claims should be deemed to be in condition for allowance. Accordingly, Applicants respectfully request that the rejections of dependent Claims 3-4 and 7-10 also be withdrawn.

Claims 2, 11, 24 and 25 stand rejected under 35 U.S.C. § 103(a) in view of Colclaser. Insofar as these rejections may be applied against the amended claims, they should be deemed overcome. Claims 24 and 25 have been cancelled in this Response. Therefore, the rejections of these claims are moot.

Claims 2 and 11 depend upon and further limit amended Claim 1. Hence, for at least the aforementioned reasons, these Claims should be deemed to be in condition for allowance. Accordingly, Applicants respectfully request that the rejections of dependent Claims 2 and 11 also be withdrawn.

Claim 12 stands rejected under 35 U.S.C. § 103(a) in view of Colclaser and U.S. Patent 6,141,245 to Bertin et al. (Bertin). Insofar as this rejection may be applied against the amended claims, it should be deemed overcome. Claim 12 depends upon and further limits amended Claim 1. Hence, for at least the aforementioned reasons, this Claim should be deemed to be in condition for allowance. Accordingly, Applicants respectfully request that the rejection of dependent Claim 12 also be withdrawn.

Claim 29 stands rejected under 35 U.S.C. § 103(a) in view of Colclaser and U.S. Patent 6,509,236 to Aipperspach et al. (Aipperspach). Insofar as this rejection may be applied against the amended claims, it should be deemed overcome. Claim 29 depends upon and further limits amended Claim 1. Hence, for at least the aforementioned reasons, this Claim should be deemed to be in condition for allowance. Accordingly, Applicants respectfully request that the rejection of dependent Claim 29 also be withdrawn.

Claims 26-28 stand rejected under 35 U.S.C. § 103(a) in view of Bertin. Claims 26-28 have been cancelled in this Response. Therefore, the rejections of these claims are moot.

Claim 31 has been added in this Response. Claim 31 is an independent method claim with the limitations of independent Claim 1. Accordingly, Applicants respectfully request the allowance of Claim 31 as a new claim.

Applicants have now made an earnest attempt to place this Application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicants respectfully request full allowance of Claims 1-4, 7-12, 29, and 31.

Applicants believe that a \$250.00 fee is due for an additional, independent claim. The Commissioner is hereby authorized to charge \$250.00 in Response to the office action as well as charge any additional required fees due (other than issue fees), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 50-0605 of CARR LLP.

Should the Examiner deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

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